

MARITIME TRADES COUNCIL

OF GREATER BOSTON AND NEW ENGLAND AFL-CIO



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January 12, 2004

M.T.D. Affiliates

Boston Plasters & Cement Masons
Local #534

Building & Construction Trades Council
of the Metropolitan District

International Brotherhood of
Electrical Workers
Local #103

International Brotherhood of
Firemen & Oilers
Local #3, SEIU

International Longshoremen's Association

International Organization of
Master, Mates & Pilots

International Union of Elevator
Constructors Local #4

International Union of
Operating Engineers
Local #4 & its Branches

Massachusetts AFL-CIO

National Maritime Union of America, SIUNA

Painters & Allied Trades
Local Council #35

Service Employees International
Union #254

Pile Drivers Local Union #56

Pipefitter's Association
Local Union #537, U.A.

Seafarers International Union of
North America, AFL-CIO

Service Employees
International Union
Local 254, AFL-CIO

Sheet Metal Workers
International Association
Local Union #17

United Brotherhood of Carpenters
& Joiners of America, Millwright
Local #1121

Susan Tierney
Chair, Ocean Management Task Force
Commonwealth of Massachusetts
Executive Office of Environmental Affairs
251 Causeway Street, Suite # 900
Boston, Mass. 02114-2119

Dear Chairman Tierney,

I write to on behalf of the over 70,000 members of the Boston and New England Maritime Trades Council, AFL-CIO. Our organization represents unionized workers engaged in marine and maritime related industries. Skilled, local workers that range from fishermen, to merchant mariners, dock workers, dredge and ferry workers, pile drivers, and many other marine and building trades personnel. We are concerned over several of the recommendations being made by the Ocean Management Task Force and the potential impact these points could have on current and future development projects.

An analysis of your recently released recommendations indicates the Task Force wants to add requirements and conditions to the permitting process for projects already in the middle of a permitting review. Certainly the Commonwealth has the right to regulate its coast and contiguous waterways to protect all of its citizens. Conversely, developers and those who submit applications for state permits should have the right to assume that the review process will not be altered, or changed, in the middle of the application process. These new requirements would replace the current system, which has clear rules and fees, with a system based on subjective rules and unknown taxes. These proposed

regulations could add substantial cost to the projects already under permitting review, possibly jeopardizing these developments. The Ocean Management Task Force recommendations must be constructed fairly and should clearly provide that the Ocean Management Act is not intended to impair or delay ongoing projects.

The livelihood of our members is depended upon maritime commerce and we are therefore acutely sensitive to all federal and state statutes or policies. Any changes to established laws or regulations could have extreme impacts on the people we represent. We ask that you revise recommendations 1, 2, 3, 4, and 5 so as not to impede or obstruct projects currently under review. Let those projects that have permit applications pending to proceed through the process under the existing requirements and be reviewed fairly and impartially.

Sincerely,



Gerard Dhooze
President, Boston & New England
Maritime Trades Council, AFL-CIO

cc: Sen. Kennedy
Sen. Kerry
Cong. Delahunt
Cong. Lynch
Cong. Tierney
Cong. Capuano
Cong. Frank
Cong. Markey
Cong. McGovern
Cong. Meehan
Mayor Menino
Mayor Kalisz
Mayor Bell
Sen. Murray
Sen. O'Leary
Sen. Tarr
Rep. Gifford
Rep. Verga